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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

: Chapter 11
: Case No. 09-10156 (ALG)
TRONOX INCORPORATED, et al., :

Debtors.

TRONOX INCORPORATED, et al.,

Plaintiffs,

V.

KERR-MCGEE CORPORATION, et al.,

Defendants.

THE UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

V.

TRONOX, INC., et al.,

Defendants.

Adv. Pro. No. 09-01198 (ALG)

Jointly Administered

## NOTICE OF LODGING OF PROPOSED SETTLEMENT AGREEMENT

The United States of America hereby lodges with the Court the proposed Settlement Agreement, attached hereto as Exhibit A. The Settlement Agreement has been executed by all parties.

The United States requests that the Court not approve the proposed Settlement

Agreement at this time. Notice of the lodging of the proposed Settlement Agreement will be published in the Federal Register, following which the United States Department of Justice will accept public comments on the proposed Settlement Agreement for a 30-day period. This document will be available during this comment period at http://www.usdoj.gov/enrd/Consent Decrees.html. After the conclusion of the public comment period, the United States will file with the Court any comments received, as well as responses to the comments, and at that time, if appropriate, will request that the Court approve the proposed Settlement Agreement.

Dated: New York, New York April 3, 2014

> PREET BHARARA United States Attorney for the Southern District of New York Attorney for the United States of America

By: /s/Robert William Yalen ROBERT WILLIAM YALEN Assistant United States Attorney 86 Chambers Street, 3rd Floor New York, New York 10007 Telephone: (212) 637-2722 Facsimile: (212) 637-2702 Email: robert.yalen@usdoj.gov